



UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

-----x
UNITED STATES OF AMERICA,

v.

CRIM. NO. 97-271 (GAG)

CARLOS GUTIERREZ-NARANJO,

Defendant,
-----x

MOTION FOR THE
PRODUCTION OF TRANSCRIPTS

COMES NOW, defendant pro se at FCI Fort Dix, NJ, files this motion for the production of transcripts. The defendant basis this request on the grounds set forth below.

1) Pending before this court is the defendant's motion for the return of property.

2) In the government's opposition brief for the return of property filed on September 11, 2007, the government alleges that the defendant's guilty plea to count 1 and 4 of the indictment entered into on November 26, 2003, agreed to forfeit the property the defendant is now attempting to have returned.

3) The government has failed to provide copies of such documents in it's opposition response brief and the defendant does not recall going into such an agreement with the government in the plea agreement, or hearing and or at sentencing.

4) As a result, the defendant is unable to file a reply to the government's opposition in the absence of the production of these documents.

5) Therefore, the defendant is now requesting to direct

the government to provide him with the following document; (i) plea agreement; (ii) plea hearing transcripts of November 26, 2003; (iii) sentencing hearing transcripts of March 26, 2004; and (iv) final order of forfeiture entered on May 17, 2004 and May 28, 2004.

Wherefore, the defendant moves this Honorable court to direct the government to provide the following legal documents to include; (i) plea agreement; (ii) plea hearing of 11-26-03; (iii) sentencing hearing of 03-26-04; and order of forfeiture dated 03-08-04, 05-17-04, and 05-28-04.

CONCLUSION:

For the reasons set forth, relief be granted.

Respectfully Submitted,



Carlos Gutierrez-Naranjo
#31804-039
FCI Fort Dix
P.O.Box 2000
Fort Dix, NJ 08640.

October 3, 2007.

PROOF OF SERVICE

I certify that on 10-01-07 (date) I mailed a copy of this brief and all attachments via first class mail to the following parties at the addresses listed below:

Maritza Gonzalez-Rivera
Assistant United States Attorney
Torre Chardon, Suite 1201
350 Chardon St
Hato Rey Puerto Rico 00918.

PROOF OF SERVICE FOR INSTITUTIONALIZED OR INCARCERATED LITIGANTS

In addition to the above proof of service all litigants who are currently institutionalized or incarcerated should include the following statement on all documents to be filed with this Court:

I certify that this document was given to prison officials on 10-01-07 (date) for forwarding to the Court ~~Appeals~~. I certify under penalty of perjury that the foregoing is true and correct. 28 U.S.C. §1746.

Carlos Gutierrez Parra
Signature

Dated: 10-01-07